

## **SCHEDULE A**

### **INSTRUCTIONS**

1. You are required to search not only for hard copy documents, but for electronically generated, maintained, or stored information, including data that exist on your computer's hard drive, on computer servers to which you have access, in email accounts, in text messaging accounts, and all other places in which responsive electronic data may be stored.

2. Where possible, all electronically generated, maintained or stored information should be produced in its native format and in a format compatible to litigation-support databases and review systems. Where possible, such documents should contain searchable text and searchable metadata in a load file format.

3. When used in these Requests, “Diamond Select” means Diamond Select Lead Group of Oregon, and all parent, related, affiliate and subsidiary companies, and each of their employees and agents. This includes, but is not limited to, Craig Mattson.

4. When used in these Requests, “you” or “your” (or synonyms thereof) means AM Communication Labs Inc., including any subsidiaries or affiliated enterprises, and its officers, directors and employees.

5. Unless otherwise instructed, the requests are seeking documents from June 2018 through April 30, 2024.

### **REQUESTS**

**Request No. 1:** All documents containing any of the following information for each outbound call made by Diamond Select during the requested period:

- the date and time;
- the caller ID;

- the result;
- identifying information for the recipient.
- any information showing the called party's response to the call; and
- any recorded message or dialing system used to send the calls.

**Request No. 2:** All correspondence with any third party regarding Allied First Bank.

**Request No. 3:** All correspondence with any third party other than your attorney regarding this litigation.